

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE)
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DMCA § 512(h) Subpoena to) Case No. 18-cv-6069
GoDaddy.com LLC)
)
)

**REQUEST FOR ISSUANCE OF SUBPOENA
UNDER 17 U.S.C. §512(H)**

ManpowerGroup Inc. (“ManpowerGroup”), by and through counsel, respectfully requests that the Clerk of this Court issue a subpoena to GoDaddy.com LLC (“GoDaddy”) to identify an alleged infringer pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h) (the “DMCA Subpoena”). ManpowerGroup respectfully presents the following required documentation and states as follows:

1. The DMCA Subpoena is directed to GoDaddy, which is the online service provider for the domain: manpowergroup.today.
2. Under Section 512(h)(2) of the DMCA, ManpowerGroup is required to provide 1) a copy of the “take down” notification described in Section 512(c)(3)(a) of the DMCA, 2) a proposed subpoena; and 3) “a sworn declaration to the effect that the purpose for which the subpoena is sought is to obtain the identity of an alleged infringer and that such information will only be used for the purpose of protecting rights under this title”. DMCA.17 U.S.C. 512(h)(2)(A)-(C).

3. Once these documents are provided, the Clerk of the Court “...shall expeditiously issue and sign the proposed subpoena and return it to the requester for delivery to the service provider.” 17 U.S.C. 512(h)(4).

4. In compliance with this statutory provision, ManpowerGroup provides the following:

- a. A copy of the notification provided to GoDaddy, which complies with Section 512(c)(3)(a) of the DMCA. See Exh. A;
- b. A proposed subpoena to GoDaddy. See Exh. B;
- c. A Declaration from ManpowerGroup’s counsel. See Exh. C.

ManpowerGroup therefore respectfully requests that the Clerk of this Court expeditiously issue and sign the proposed subpoena, which is attached as Exhibit B. ManpowerGroup further requests that the Clerk return the subpoena to ManpowerGroup’s counsel for service to GoDaddy.

Dated: September 5, 2018

Respectfully submitted,
ManpowerGroup Inc., by:

/Christopher B. Lay/

Christopher B. Lay
IpHorgan Ltd.
195 Arlington Heights Rd., Ste. 125
Buffalo Grove, IL 60089
Tel: (847) 808-5500
Fax: (847) 808-7238
Emails: mail@iphorgan.com
clay@iphorgan.com
Attorney for ManpowerGroup Inc.